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August 24, 2018

VIA ECF

Hon. Sarah Netburn
United States Magistrate Judge
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Centauro Liquid Opportunities Master Fund L.P. v. Bazzoni*,
No. 15 Civ. 9003 (LTS) (SN)

Dear Judge Netburn:

We represent defendant Elemento Ltd. (“Elemento”). With the consent of all parties, we write to seek the Court’s approval for a two-week extension of the deadline to file summary judgment motions, from August 31 to September 14, 2018. We seek the extension to allow Elemento to produce and the other parties to consider a cache of non-email electronic communications among persons involved with Elemento.

We recently discovered these communications. Production has been delayed because of a technical issue, which we expect Elemento will soon overcome.

We have only superficially reviewed some of these communications and are unable to fully describe their contents. Our preliminary assessment, however, is that some are relevant to this dispute and responsive to discovery demands.

We believe that a two-week extension will allow Elemento sufficient time to overcome the technical obstacle and produce as appropriate, as well as to allow the parties to consider any such production in connection with any contemplated summary judgment motions.

This is the first requested extension since the Court set the schedule at the end of discovery. ECF 206. During the life of the case, however, the Court changed the motion date in light of ongoing discovery.

Kindly note that Plaintiff’s consent is without prejudice to seeking additional time or other relief once Plaintiff has had the opportunity to review the production.

We thank the Court for its consideration.

Respectfully yours,

/s/Michael T. Sullivan

Michael T. Sullivan

cc: All counsel of record, via ECF